## Remarks

I. Summary of the Office Action

Claims 1-5, 7, 9-14, 18-32, 34, 36-42, 47-63, 65-90, 92-109, and 124-129 were pending in this application.

Claims 110-123 were objected to for being directed to a non-elected invention.

Claims 1-5, 10, 11, 13, 14, 18, 19, 23, 24, 26-32, 37, 38, 40-42, 48, 49, 53, 54, and 56 were rejected under 35 U.S.C. § 103(a) as being obvious from Inoue et al. U.S. Patent No. 5,884,141 (hereinafter "Inoue") in view of Lortz U.S. Patent No. 6,349,410 (hereinafter "Lortz").

Claims 7, 9, 34, and 36 were rejected under 35 U.S.C. § 103(a) as being obvious from Inoue in view of Lortz, and in further view of Ismail et al. U.S. Patent No. 6,614,987 (hereinafter "Ismail").

Claims 12, 39, and 47 were rejected under 35 U.S.C. § 103(a) as being obvious from Inoue in view of Lortz, and in further view of Baker et al U.S. Patent No. 5,583,561 (hereinafter "Baker").

Claims 20, 21, 50, and 51 were rejected under 35 U.S.C. § 103(a) as being obvious from Inoue in view of Lortz, and in further view of Banker et al. U.S. Patent No. 5,357,276 (hereinafter "Banker").

Claims 22, 25, 52, 55, and 124-127 were rejected under 35 U.S.C. § 103(a) as being obvious from Inoue in view of Lortz, and in further view of Armstrong et al. U.S. Patent No. 7,017,173 ("Armstrong").

Claims 57-63, 65-74, 76-90, 92-103, 105-109, 128, and 129 were rejected under 35 U.S.C. § 103(a) as being obvious from Inoue in view of Armstrong.

Claims 75 and 104 were rejected under 35 U.S.C. § 103(a) as being obvious from Inoue in view of Armstrong, and in further view of Banker.

II. Summary of Applicants' Reply

Applicants have canceled claims 110-123 without prejudice. Applicants respectfully traverse the Examiner's rejections.

III. Applicants' Reply to the Objection to Claims 110-123

The Examiner objected to claims 110-123 for being directed to a non-elected invention. Applicants have canceled claims 110-123 without prejudice, and expressly reserve the right to pursue these claims in one or more divisional applications. Accordingly, applicants respectfully request that the Examiners objections be withdrawn.

IV. Applicants' Reply to the Claim Rejections

Claims 1-5, 7, 9-14, 18-32, 34, 36-42, 47-56, and 124-127

Applicants' independent claims 1 and 27 are directed to a method and system for substituting pause-time content in place of media that is paused. The interactive media application is implemented at least partially on user equipment that includes a storage for storing a plurality of pause-time content local to a user. The user is provided with the ability to pause the media. Local to the user, the user equipment automatically determines which of the plurality of pause-time content stored in the local storage to play while the media is paused. The determined pause-time content is automatically retrieved. While the media is paused, the determined pause-time content is played and the media is recorded.

The Examiner rejected applicants' independent claims 1 and 27 as being obvious from Inoue in view of Lortz. In particular, the Examiner states that, "[I]t would have been obvious to a person of ordinary skill in the art, to modify the broadcasted media programs, as taught by Inoue, using the embedded URLs ... displayed when a TV broadcast program is paused, as taught by Lortz, for the purpose of coordinating the display of an incoming signal stream on a display with web browsing" (*see* Office Action, pages 9-11). Applicants respectfully traverse the Examiner's rejection.

Applicants respectfully submit that contrary to the Examiner's contention, one of ordinary skill in the art would not combine Inoue and Lortz to produce applicants' claimed invention. In fact, applicants submit that if one of ordinary skill in the art were to combine

these two references in the manner suggested by the Examiner, one would produce a system that is entirely different from applicants' claimed invention.

Inoue refers to displaying a program or a pause graphics screen during a pause in the display of a video program (*see* col. 6, lines 30-33). Lortz refers to storing a signal stream with a plurality of embedded URLs on a set top box. When a display of the signal stream is paused, the most recently stored URL is used to obtain and display web content from a remote web server. (*see* col. 3, lines 29 through col. 4, line 16).

By modifying Inoue using the embedded URLs of Lortz, one of ordinary skill would still create a system in which web content stored in a remote web server (and obtained using embedded URLs stored on user equipment) is used as the content displayed during a pause. Thus, the combination would at least fail to show a storage on user equipment for storing a plurality of pause-time content, as recited by applicants' independent claims 1 and 27. Accordingly, even assuming, *arguendo*, that one of ordinary skill would combine Inoue and Lortz in the manner suggested by the Examiner, the resulting combination would not produce applicants' claimed invention. The Examiner has therefore not provided any logical reason for why one of ordinary skill in the art would combine Inoue and Lortz to obtain the features of applicants' independent claims 1 and 27.

For at least this reason, applicants respectfully submit that independent claims 1 and 27 are allowable over Inoue and Lortz. Claims 2-5, 7, 9-14, 18-26, 28-32, 34, 36-42, 47-56, and 124-127 depend variously from allowable independent claims 1 and 27 and are therefore allowable for at least the same reason. Applicants respectfully request, therefore, that the § 103(a) rejections of claims 1-5, 7, 9-14, 18-32, 34, 36-42, 47-56, and 124-127 be withdrawn.

Claims 57-63, 65-90, 92-109, 128, and 129

Applicants' independent claims 57 and 81 are directed to a method and system for substituting pause-time content in place of media that is paused using an interactive media application. A user is provided with the ability to pause the media while the media is playing. Local to the user, targeted pause-time content to play while the media is paused is determined

based on at least one of monitored user interests and predetermined criteria defined by the user. The determined pause-time content is played by substituting the determined pause-time content in place of the media while the media is paused.

The Examiner rejected applicants' independent claims 57 and 81 as being obvious from Inoue in view of Armstrong. Specifically, the Examiner states that "[I]t would have been obvious to a person of ordinary skill in the art, to modify the pause-time content display system, as taught by Inoue and Lortz to utilize the targeted pause-time content feature, as taught by Armstrong, for the purpose of providing demographically appropriate advertisement content" (*see* Office Action, pages 23 and 24). Applicants respectfully traverse the Examiner's rejection.

Applicants respectfully submit that contrary to the Examiner's contention, one of ordinary skill in the art would not combine Inoue and Armstrong to produce applicants' claimed invention. Rather, applicants submit that combining these two references in the manner suggested by the Examiner would produce an entirely different system than applicants' claimed invention.

Armstrong refers to presenting a subset of a predetermined group of targeted advertisements that corresponds to the currently displayed scene of a paused program based on a user's demographic profile (*see* col. 5, lines 33-61). By modifying Inoue using Armstrong, one of ordinary skill would create a system in which a subset of a predetermined group of targeted advertisements is presented during a pause. Such a combination would therefore fail to show locally determining targeted pause-time content to play while media is paused, as recited by applicants' independent claims 57 and 81. Accordingly, even assuming, *arguendo*, that one of ordinary skill would combine Inoue and Armstrong in the manner suggested by the Examiner, the resulting combination would not produce applicants' claimed invention. The Examiner has therefore not provided any logical reason for why one of ordinary skill in the art would combine Inoue and Armstrong to obtain the features of applicants' independent claims 57 and 81.

In view of the foregoing, applicants respectfully submit that independent claims 57 and 81 are allowable over Inoue and Armstrong. Claims 58-63, 65-80, 82-90,

92-109, 128, and 129 are also allowable at least because claims 58-63, 65-80, 82-90, 92-109, 128, and 129 depend variously from allowable independent claims 57 and 81. Applicants respectfully request, therefore, that the § 103(a) rejections of claims 57-63, 65-90, 92-109, 128, and 129 be withdrawn.

V. Conclusion

In view of the foregoing, claims 1-5, 7, 9-14, 18-32, 34, 36-42, 47-63, 65-90, 92-109, and 124-129 are in condition for allowance. This application is therefore in condition for allowance. Reconsideration and allowance of this application are respectfully requested.

Respectfully submitted,

/Baaba Andam/

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